

Exhibit F

COOLEY LLP
BOBBY GHAJAR (198719)
(bghajar@cooley.com)
COLETTE GHAZARIAN (322235)
(cghazarian@cooley.com)
1333 2nd Street, Suite 400
Santa Monica, California 90401
Telephone: (310) 883-6400

COOLEY LLP
MARK WEINSTEIN (193043)
(mweinstein@cooley.com)
KATHLEEN HARTNETT (314267)
(khartnett@cooley.com)
JUDD LAUTER (290945)
(jlauter@cooley.com)
ELIZABETH L. STAMESHKIN (260865)
(lstameshkin@cooley.com)
3175 Hanover Street
Palo Alto, CA 94304-1130
Telephone: (650) 843-5000

CLEARY GOTTlieb STEEN & HAMILTON LLP
ANGELA L. DUNNING (212047)
(adunning@cgsh.com)
1841 Page Mill Road, Suite 250
Palo Alto, CA 94304
Telephone: (650) 815-4131

[Full Listing on Signature Page]

Counsel for Defendant Meta Platforms, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

RICHARD KADREY, et al.,

Individual and Representative Plaintiffs,

v.

META PLATFORMS, INC., a Delaware
corporation;

Defendant.

Case No. 3:23-cv-03417-VC

**DEFENDANT META PLATFORMS, INC.'S
AMENDED RESPONSES AND OBJECTIONS
TO PLAINTIFFS' SECOND SET OF
INTERROGATORIES**

Trial Date:
Date Action Filed: July 7, 2023

1 and undue burden and expense. Meta further objects to Instruction 11 to the extent that it purports
 2 to require Meta to investigate information outside of its possession, custody, or control. As such
 3 the Instruction is overly broad, as well. Subject to any objections applicable to a particular
 4 Interrogatory, Meta will conduct a reasonable, proportionate search for non-privileged, relevant,
 5 responsive information within its possession, custody, or control.

6 **19.** In responding to all Interrogatories, Meta will comply with the requirements of the
 7 Federal Rules of Evidence and Federal Rule of Civil Procedure 26.

8 **III. OBJECTIONS AND RESPONSES TO INDIVIDUAL INTERROGATORIES**

9 **INTERROGATORY NO. 17:**

10 If You or any of Your employees and/or agents intend to assert the advice of counsel
 11 defense, state any and all facts upon which You or any of your employees and/or agents intend to
 12 rely on for that contention.

13 **AMENDED RESPONSE TO INTERROGATORY NO. 17:**

14 Meta incorporates by reference its objections and definitions above.

15 Meta objects to this Interrogatory as vague and ambiguous as to the reference to “Your
 16 employees and/or agents” with respect to any defense in this case, as no Meta employees or agents
 17 are parties to this case.

18 Meta objects to this Interrogatory because it exceeds Plaintiffs’ limit of 25 Interrogatories
 19 under Rule 33(a)(1).

20 Subject to and without waiving the foregoing objections, Meta responds as follows: As Meta
 21 witnesses have testified, Meta had a review process for datasets used to train the Meta Language
 22 Models (as construed above) that included, as one component, a legal review. However, Meta does
 23 not intend to assert the advice of counsel defense in this case.

24
25
26
27
28

1 Dated: November 19, 2024

COOLEY LLP

2 By: /s/ Judd Lauter

3 Bobby Ghajar
4 Mark Weinstein
5 Kathleen Hartnett
6 Phillip Morton
7 Judd Lauter
8 Elizabeth L. Stameshkin
9 Matthew Brigham
10 Colette Ghazarian
11 Juan Pablo Gonzalez
12 Cole A. Poppell

LEX LUMINA PLLC
Mark A. Lemley

CLEARY GOTTlieb STEEN &
HAMILTON LLP
Angela L. Dunning

Attorneys for Defendant
META PLATFORMS, INC.

13 *Full Counsel List*

14 COOLEY LLP
15 PHILLIP MORTON (*pro hac vice*)
16 (pmorton@cooley.com)
17 COLE A. POPPELL (*pro hac vice*)
18 (cpoppell@cooley.com)
19 1299 Pennsylvania Avenue, NW, Suite 700
20 Washington, DC 20004-2400
21 Telephone: (202) 842-7800

18 COOLEY LLP
19 MATTHEW BRIGHAM (191428)
20 (mbrigham@cooley.com)
21 JUAN PABLO GONZALEZ (334470)
22 (jgonzalez@cooley.com)
23 3175 Hanover Street
24 Palo Alto, CA 94304-1130
25 Telephone: (650) 843-5000

23 LEX LUMINA PLLC
24 MARK A. LEMLEY (155830)
25 (mlemley@lex-lumina.com)
26 745 Fifth Avenue, Suite 500
27 New York, NY 10151
28 Telephone: (646) 898-2055